

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOROTHY STANLEY, as Executrix of the
ESTATE of HELEN RUNGE,

Plaintiff,

v.

WALTER J. KELLY; KERRY L.
BLOOMINGDALE, M.D.; and
SUNBRIDGE NURSING AND
REHABILITATION CENTER,

Defendants.

Civil Action No. 05-10849-RGS

**DEFENDANT KELLY'S OBJECTIONS TO PLAINTIFF'S DESIGNATION OF
FARRAH SEIDLER'S DEPOSITION TESTIMONY**

Defendant objects to the following testimony of Farrah Seidler which Plaintiff has
proposed to read at trial:

Page 8, line 15 – Defendant objects only to inclusion of “one of the Defendants in this matter”.

It is Confusing, misleading and prejudicial.

Page 19, lines 5-21. No foundation.

Page 21, lines 10-16. No foundation.

Page 43, lines 9-25 – Page 44, lines 1-6. No foundation and it is unclear what document is
being read from.

Page 67, lines 10-25. Starts with a “Yes.” No foundation, and it is unclear what “form” is being
discussed.

Page 69, lines 7-18. This is not within Deponent's personal knowledge. Deponent says she will
“wager a guess.”

Page 114, line 25-Page 117, Line 8. It is unclear what document is referred to and again Deponent says she would “wager a guess”.

Page 119, Page 7-8. These lines are an objection by counsel.

Page 144, lines 24-25 - Page 146, lines 1-5. There is no foundation. It is confusing as it starts with “I would think exactly what is says.” Also, Page 145, lines 18-25 – Page 146, lines 1-5 is hearsay.

Respectfully submitted,

The Defendant, Walter J. Kelly,
By his attorneys,

s/ Michele Carlucci
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Michele Carlucci, BBO #655211
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CERTIFICATE OF SERVICE

I, Michele Carlucci, certify that on June 21, 2008, I have served a copy of the foregoing by electronic filing.

/s/ Michele Carlucci
Michele Carlucci